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Nelson Martinez, solely in his individual capacity

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

NELSON MARTINEZ,

Plaintiff,

v.

ISM CONNECT, LLC, F/K/A DATA
TRANSFER, LLC,

Defendant.

ISM CONNECT, LLC F/K/A DATA
TRANSFER, LLC,

Counter-Claimant,

v.

NELSON MARTINEZ,

Counter-Defendant.

Case No.: 2:17-cv-02905-GMN-GWF

**STIPULATION TO EXTEND TIME TO
FILE RESPONSES/REPLIES TO
MOTIONS (First Request)**

1 NELSON MARTINEZ, in his individual
2 capacity,

3 Third-Party Plaintiff,

4 v.

5 JEFFREY HUTCHINS, RALPH C. OLSEN,
6 MARK DEL VECCHIO, and KURT
BOROWSKY,

7 Third-Party Defendants.
8

9 All parties in this action, including (a) Plaintiff Nelson Martinez, solely in his capacity as
10 the representative for the former members of Ingenuity Sun Media, LLC, (b) Counter-Defendant
11 Nelson Martinez, in his individual capacity, and (c) Defendant/Counterclaim-Plaintiff ISM
12 Connect, LLC F/K/A Data Transfer, LLC (“Defendant”) (collectively, the “Parties”) hereby
13 stipulate to extend time to file responses/replies to motions in light of the holiday (4th of July).
14 Plaintiff’s Reply to Response (ECF No. 57) to Motion for Protective Order/Motion to Quash
15 (ECF Nos. 49, 50) is currently due by **July 5, 2018**. Plaintiff’s Response to Defendant’s
16 Countermotion to Compel (ECF No. 59) is currently due by **July 12, 2018**. The hearing for
17 Plaintiff’s Motions (ECF Nos. 49, 50) is currently set for **July 16, 2018**, at 9:30 A.M.

18 This is the first stipulation for extension of time to file responses/replies. The parties
19 hereby stipulate to extend/shorten the response/reply deadlines as follows:

- 20 • Mr. Martinez’s Reply to Response (ECF No. 57) to Motion for Protective
21 Order/Motion to Quash (ECF Nos. 49, 50) and Mr. Martinez’s Response to
22 Defendant’s Countermotion to Compel (ECF No. 59) are due by **July 10, 2018**;
- 23 • Defendant’s Reply to Plaintiff’s Response to Defendant’s Countermotion to
24 Compel (ECF No. 59) is due by **July 13, 2018**; and

25 / /

26 / /

27 / /

- 1 • The hearing date will remain as scheduled on **July 16, 2018**, at 9:30 A.M.

2 Dated this 3rd day of July, 2018.

Dated this 3rd day of July, 2018.

3 **BALLARD SPAHR LLP**

FABIAN VANCOTT

4 /s/ Joel E. Tasca

/s/ Kevin N. Anderson

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LLC*

12 *Attorneys for ISM Connect, LLC, F/K/A Data
Transfer, LLC*

13 Dated this 3rd day of July, 2018.

14 **SANTORO WHITMIRE**

15 /s/ Nicholas J. Santoro

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21 *Attorneys for Nelson Martinez, solely in his
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22 **IT IS SO ORDERED.**

23 
24 _____
UNITED STATES MAGISTRATE JUDGE

25 Date: 7-5-2018